

Civil Court of the City of New York
County of Bronx

Index Number 13405-2007

LR CREDIT LLC Plaintiff(s),

-against-
JOSE GUZMAN Defendant(s),

Defendant JOSE GUZMAN answers the Complaint as follows:

ANSWER: (Check all that apply)

1. General Denial: I deny the allegations in the Complaint.

SERVICE

2. I did not receive a copy of the Summons and Complaint.

3. I received the Summons and Complaint, but service was not correct as required by law.

DEFENSES

4. I do not owe this debt.

5. I did not incur this debt. I am a victim of identity theft or mistaken identity.

6. I have paid all or part of the alleged debt.

7. I dispute the amount of the debt.

8. I do not have a business relationship with Plaintiff (Plaintiff lacks standing).

9. The NYC Department of Consumer Affairs shows no record of plaintiff having a license to collect debt.

10. Plaintiff does not allege a debt collector's license number in the Complaint.

11. Statute of limitations (the time has passed to sue on this debt).

12. This debt has been discharged in bankruptcy.

13. The collateral (property) was not sold at a commercially reasonable price.

14. Unjust enrichment (the amount demanded is excessive compared with the original debt).

15. Violation of the duty of good faith and fair dealing.

16. Unconscionability (the contract is unfair).

17. Laches (plaintiff has excessively delayed in bringing this lawsuit to my disadvantage).

18. Defendant is in the military.

19. Other _____

OTHER

20. Please take notice that my only source of income is _____, which is exempt from collection.

COUNTERCLAIM(S)

21. Counterclaim(s): \$ _____ Reason: _____

Suffolk

VERIFICATION

State of New York, County of Bronx ss:

JOSE GUZMAN, being duly sworn, deposes and says: I have read the Answer in Writing and know the contents to be true from my own knowledge, except as to those matters stated on information and belief, and as to those matters I believe them to be true.

Sworn to before me this 27 day of July, 2015.
Donna Romano

Notary/Court Employee

DONNA A. ROMANO
Notary Public, State of New York
Qualified in Suffolk County
No. 01R06259418

This case is scheduled to appear on the calendar as follows: My Commission Expires: Aug 16

Jose D. Guzman
Signature of Defendant

70 W Euclid St 1
Defendant's address
Valley Stream NY 11580

Date: _____ Part: _____ Room: _____ Time: _____ Both sides notified _____

CIV-GP-58b Written Answer Consumer Credit (12/08) FREE CIVIL COURT FORM No fee may be charged to fill in this form.

Form can be found at: <http://www.nycourts.gov/courts/nyc/smallclaims/forms.shtml>.

Prepared with the assistance of the Bronx CLARO Program by Guzman